

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA
WILKES-BARRE DIVISION**

IN RE:	:	CHPATER 13
MICHAEL THOMAS COOK	:	
aka MICHAEL T. COOK	:	CASE NO. 5:23-bk-00772-MJC
aka MICHAEL COOK AND	:	
SAMANTHA ANN ROBAYO	:	
aka SAMANTHA A. ROBAYO	:	
aka SAMANTHA ROBAYO	:	
Debtors,	:	
CAPITAL ONE AUTO FINANCE,	:	
A DIVISION OF CAPITAL ONE, N.A.,	:	
Movant,	:	
v.	:	
MICHAEL THOMAS COOK	:	
aka MICHAEL T. COOK	:	
aka MICHAEL COOK AND	:	
SAMANTHA ANN ROBAYO	:	
aka SAMANTHA A. ROBAYO	:	
aka SAMANTHA ROBAYO	:	
Respondents,	:	
JACK N ZAHAROPOULOS	:	
Trustee.	:	

DEBTOR'S RESPONSE TO MOTION FOR RELIEF FROM STAY

AND NOW come Debtors, Michael Thoms Cook and Samantha Ann Robayo, and answer the Motion for Relief from Automatic Stay of Capital One Auto Finance, a division of Capital One, N.A., as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.

5. Denied. This is a legal conclusion to which no response is required. Strict proof is demanded.
6. Admitted in part and denied in part. It is admitted the vehicle is encumbered by a security interest. It is further admitted as to the monthly payment amount and the interest rate. The remaining allegations are denied as after reasonable investigation, Debtor is without the information necessary to determine the veracity of these allegations.
7. Denied. Debtors made a payment on May 15, 2023, in the amount of \$746.00.
8. Denied. After reasonable investigation, Debtors are without the information necessary to determine the veracity of these allegations.
9. Denied. This is a legal conclusion to which no response is required. Strict proof is demanded.
10. Denied. After reasonable investigation, Debtors are without the information necessary to determine the veracity of these allegations.
11. Denied. This is a legal conclusion to which no response is required. Strict proof is demanded.
12. Denied. This is a legal conclusion to which no response is required. Strict proof is demanded.
13. Denied. After reasonable investigation, Debtors are without the information necessary to determine the veracity of these allegations.

WHEREFORE, Debtors, Michael Thomas Cook and Samantha Ann Robayo, respectfully request the Court deny the Motion for Relief.

Respectfully Submitted,

NEWMAN WILLIAMS

By: /s/ Robert J. Kidwell, Esquire
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